

PROCUREMENT OF CONSULTANT SERVICES FOR SPONSORED PROJECTS

I. PURPOSE

This policy statement sets forth guidelines which implement the regulations of sponsoring agencies concerning the procurement of consultant services and adapt these regulations to the needs and established processes of the University.

Note: This policy was originally issued on 10/1/82 and updated in FY 86. This version was created so that the policy was available on the web (as of 8/03).

II. APPLICABILITY

This policy is applicable to activities under all externally funded research, development, training, and educational service grants and contracts involving payments to individuals for advisory or other personal services, the costs of which are borne wholly or in part by the grant or contract funds or which are used to satisfy cost sharing requirements of the grant or contract.

III. DEFINITION

A consultant is a particularly well qualified person who is retained as an individual to give professional advice or services for a fee, and who is not an employee of the organization that engages him/her. This term includes paid guest lecturers and speakers. It does not include advisory or other services rendered by firms or organizations.

IV. WASHINGTON UNIVERSITY AND GOVERNMENT EMPLOYEES

- A. It is the general practice of the Washington University faculty, as well as the non-academic staff, to participate in intra-university activities of sponsored projects as an employment obligation requiring no compensation in addition to full time base salary. Normally, financial arrangements are made between the collaborating schools/departments to have an appropriate share of the base salary of such employees charged to the personnel budget of the sponsored project. Should unusual circumstances indicate the need in a specific case to depart from this accepted practice, advice should be sought from the appropriate dean(s) and department chairpersons and from the Associate Vice Chancellor for Research.
- B. Government agencies at all levels have various restrictions concerning the use by grantees and contractor of government employees as paid consultants. Should unusual circumstances indicate the need to retain any government employee as a paid consultant, guidance from the Associate Vice Chancellor for Research should be sought.

V. CONFLICTS OF INTEREST

Conflict of interest situations can arise which, for example, might involve financial or other personal interests of the prospective consultant, the University investigator or his/her relatives or the appearance of favoritism by the investigator toward his relatives or outside business associates. It is essential that the highest ethical standard be employed in the conduct of University activities so as not to reflect on the integrity of the University or its employees.

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Any actual or apparent conflict of interest situation should be handled with propriety and only after consultation with reporting seniors who themselves are well removed from the actual or apparent conflict situation. (Also see the University policy statements titled “Policy Regarding Employment of Close Relatives” and “University Policy on Conflict of Interest”.)

VI. CRITERIA

- A. **RESPONSIBILITY** - The Principal Investigator of a sponsored project is responsible for all activities of the project including the selection, retention, performance and payment of consultants.
- B. **PLANNING** - To the extent possible the need for consultant service, the cost thereof and the identity and qualifications of such consultants should be determined during project planning and should be presented in the proposal to the sponsor.
- C. **ADDITIONAL SPONSOR REQUIREMENTS** - Any additional requirements imposed by a sponsor concerning project consultant services supplement and take precedence over provisions of this policy statement.
- D. **DETERMINATION OF NEED** - The use of consultant services shall be based on a prudent determination that they are necessary for accomplishment of the project and that such services cannot reasonably be provided by the project staff.
- E. **SELECTION** - Care shall be exercised in selecting a consultant to secure an individual especially well qualified to provide the required services.
- F. **ALLOWABLE EXPENSES** - A consultant may be paid a reasonable fee, travel and subsistence expenses and other necessary expenses incurred in the performance of consulting services. The consultant fee should be appropriate considering the qualifications of the consultant, his/her normal charges, and the nature of the services to be performed. Certain government agencies limit the fee allowed to be charged to their funds. Travel expenses will be paid in accordance with the Washington University Travel Policy, a copy of which should be provided to the consultant concerning the fee to be paid and expenses to be reimbursed before commencement of consulting activities.
- G. **ALLOCATION OF COSTS** - Consultant services required solely for a specific project should be charged to that project. If such services are utilized by several projects or other activities, the costs should be apportioned appropriately.

VII. DOCUMENTATION

- A. **REQUIREMENT** - Documentation of the propriety of charges for consultant services and of compliance with sponsor requirements concerning the need for such services and the consultant’s selection must be maintained in the University’s accounting records for the project. If a written report by the consultant is required, a copy must be available in the department project files.
- B. **DOCUMENTATION OF FEE** - The form attached to this policy, Consultant Service Request/Invoice, will satisfy sponsor and University requirements for documentation. It provides a simple means of specifying the essentials of the understanding with the

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consultant ("Request" section), of obtaining an invoice from the consultant ("Invoice" section) and of providing required certifications ("Certification" section). The form should be reproduced by departments as needed. The principal investigator should complete the "Request" section and send at least two (2) copies to the consultant for acceptance. Upon completion of the consultant's performance, or more frequently as necessary if performance continues over an extended period, the consultant should complete the "Certification" section and submit it to the principal investigator. It is to be processed with a completed Check Request form for payment of the fee. Requests for payment of consultant fees for sponsored project funds will not be processed unless accompanied by a completed Consultant Service Request/Invoice.

NOTE: In those circumstances where it is considered absolutely necessary, an advance (Travel Advance Form) may be processed to facilitate having a check available to give to a guest lecturer, with the understanding that the "Consultant Service Request Invoice" will be completed and signed by the "consultant" before receiving the payment. Naturally, the completed form will be transmitted to the Accounts Payable Department of Accounting Services so that the advance can be charged to the project rather than the department.

- C. DOCUMENTATION OF TRAVEL EXPENSES - Travel and subsistence expenses of consultants will be paid or accounted for based on the submission of a Travel Expense Report, including required receipts, approved by the Principal Investigator. Reimbursable costs are those specified in the Washington University Travel Policy.

If you have any questions regarding this policy, please contact Joseph M. Gindhart, Director – Sponsored Projects Accounting, at 935-7089 or jgindhart@wustl.edu.

CONSULTANT SERVICE REQUEST INVOICE

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WASHINGTON UNIVERSITY CONSULTANT SERVICE REQUEST INVOICE

(Use for Charges on Sponsored Projects — 38X, 4X, 5X, and 6X Funds)

INSTRUCTIONS:

The Principal Investigator (P.I.) should complete and sign Page 1 and obtain the consultant's signature indicating acceptance.

The Consultant should complete and sign the Consultant's Invoice (top of Page 2).

The P.I. must then complete the Requestor's Certification Of Invoice (bottom of Page 2) for payment to be made.

The "Consultant's Invoice" section may be used for partial payment if service is for an extended period. For claiming travel and subsistence expenses attach a copy of this form to the Travel Expense form.

Request Date: _____ Signature of
Requestor (P.I.): _____

Department: _____ Printed Name: _____

The Consultant is requested to provide services as specified below:

1. Consultant's name and address _____

2. Consultant's current employer: _____

3. Project (Sponsor's ID and title): _____

4. Estimated performance period: From _____ to _____

5. & 6. Services requested and relevance of services to project.

Detail the services requested (scope of work) and relevance of services to the project. Specify if a written report is required. Special provisions such as ownership of proprietary information should be detailed. Consultation with the Research Office or Grants & Contracts is recommended if special provisions are anticipated. Attach additional sheets as necessary.

7. Fee and unit (per day, per service unit, etc.): \$ _____ / _____

8. Other expenses to be paid (e.g., travel): _____

Consultant's acceptance (signature): _____

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CONSULTANT'S INVOICE

I have provided _____ (units in days, hours, etc. same as #7 above) of the requested consultant services during the period ____ / ____ / ____ to ____ / ____ / _____. I have/have not (strike one) submitted a written report.

Consultant's signature _____

Date _____ SS# _____

REQUESTOR'S CERTIFICATION OF INVOICE

I hereby certify:

1. The consultant's fee specified in #7 (p. 1) is appropriate considering the qualification and normal charges of the consultant and the nature of the services rendered.
2. The requested services have been performed as indicated on the Consultant's Invoice.
3. The services were essential and could not have reasonably been provided by project staff.
4. The consultant was carefully selected and is well qualified to provide these services.
5. For consultant services rendered payment of \$_____ is hereby approved (exclude expenses claimed on Travel Expense Report).

Account (s) Chargeable

Amount (s)
(fee only)

Certified and Approved

Signature _____

Name _____